

**Michael N. Milby, Clark**

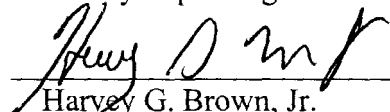
<sup>1</sup> This Motion is not intended as an appearance by this Defendant.

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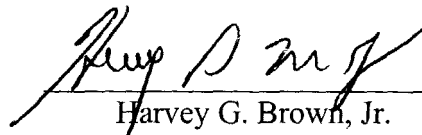
**CERTIFICATE OF CONFERENCE**

I certify that I have conferred with Robin Harrison as liaison counsel for the *Tittle* plaintiffs who, although he does not agree that their claims against Defendant Andersen-United Kingdom should be dismissed, Liaison Counsel for the Plaintiffs is not opposed to the filing of the original affidavit that Defendant Andersen-UK is hereby requesting.

  
\_\_\_\_\_  
Harvey G. Brown, Jr.

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the above and foregoing UNOPPOSED MOTION TO FILE ORIGINAL AFFIDAVIT to all counsel of record on the attached Service List pursuant to the Court Orders dated April 10, 2002 on this the 26th day of June, 2002.

  
\_\_\_\_\_  
Harvey G. Brown, Jr.

IN RE ENRON CORPORATION  
SECURITIES LITIGATION

No. H 01 3624

Hon. Melinda Harmon

PAMELA M. TITTLE, et al.,

No. H-01-3913

(consolidated with H-01-3624)

Plaintiffs,

v.

ENRON CORP., et al.,

Defendants.

**AFFIDAVIT OF JOHN ORMEROD**

The undersigned, being first duly sworn, deposes and states as follows:

1. My name is John Ormerod, and I am Country Managing Partner of Andersen-United Kingdom (“Andersen-UK”). In connection with preparing this affidavit, I have conducted a thorough inquiry into Andersen-UK’s contacts with both the State of Texas and the United States.

2. Andersen-UK comprises a number of partnerships formed in the United Kingdom, pursuant to United Kingdom law.

3. Andersen-UK's principal place of business and headquarters are located in London.

4. Andersen-UK does not own, possess or have any interest in any real property or any other assets in Texas or the United States.

5. Andersen-UK does not pay any taxes in either Texas or the United States.

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6. Andersen-UK has no offices in either Texas or the United States. Andersen-UK has no registered agent authorized to receive service of process in Texas or anywhere in the United States.

7. Andersen-UK has no employees who are based in either Texas or the United States who are engaged in providing services to its clients.

8. Andersen-UK is not registered to do business in either Texas or the United States.

9. Andersen-UK neither provides nor delivers its services in either Texas or the United States.


10. Andersen-UK is a separate and distinct entity from Andersen LLP. Andersen-UK has a contractual relationship with Andersen Worldwide Societe Cooperative ("AWSC").

11. Certain Andersen-UK partners travel to the United States for the purpose of coordinating policy for AWSC. In addition, some partners occasionally travel to the United States in connection with audits of United States-based subsidiaries of Andersen-UK clients. Andersen-UK partners travel to the United States to evaluate the work performed by Andersen LLP on those United States-based subsidiaries.

12. Andersen-UK was not engaged by Enron Corp. and has not performed any professional services for Enron Corp. Andersen-UK was, however, engaged by certain UK subsidiaries of Enron Corp. to perform certain audit services required by UK law. In addition,


Andersen LLP engaged Andersen-UK to report on Enron's European operations in connection with Andersen LLP's audits of the consolidated financial statements of Enron Corp. All of these services were performed in the UK

Further affiant says not.



John Ormerod

Sworn and subscribed to  
before me this 19th day of  
June, 2002.



DAWN TEAGUE  
SOLICITOR

The Service List

Attached

to this document

may be viewed at

the

Clerk's Office